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383608

September 5, 2008

Mr. Michael Berkoff
Remedial Project Manager
U.S. EPA Region 5
Superfund Division
Remedial Response Section #2
77 West Jackson Blvd.
SR-6J
Chicago, IL 60604

Subject:
Schedule for Draft Feasibility Study Report
Allied OU-1
Kalamazoo River Superfund Site

Dear Michael:

Pursuant to our meeting on July 31, 2008 at the Allied Operable Unit in Kalamazoo, Michigan, Millennium Holdings, LLC (Millennium) has prepared this letter to present our target schedule for submitting the Draft Feasibility Study (FS) Report for the Allied Operable Unit.

At the meeting, CH2MHill provided a preliminary draft conceptual site model for the risk evaluation (CSM) for purposes of initial discussion with Millennium and ARCADIS. It is our understanding that CH2MHill will revise the preliminary CSM based on comments from Millennium and ARCADIS. Following revision of the CSM, CH2MHill will develop a Draft Technical Memorandum presenting the numeric chemical-specific Applicable or Relevant and Appropriate Requirements (ARARs) for this site. As presented at the meeting, it is our understanding that the risk evaluation will focus on polychlorinated biphenyls (PCBs) as the site constituent of concern. Also as discussed, Millennium will have the opportunity to review and comment on draft versions of this technical memorandum.

Since the CSM and the ARARs are critical to the Remedial Action Objectives and will dictate locations on the site at which remedy may be required, the FS schedule is dependent on the completion of the Technical Memorandum. Millennium commits to providing the Draft FS Report within 120 days following receipt of the Final Technical Memorandum, but not sooner than February 27, 2009. This schedule will allow for efficient and responsive preparation of the FS Report and is expected to achieve to the previously discussed schedule goal of 1st quarter 2009.

To aid in CH2MHill's preparation of the Technical Memorandum, we also offer a summary of our comments on the preliminary draft CSM that we shared verbally during the meeting:

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- The Technical Memorandum should include a map or physical description (i.e. high water elevation) indicating the approximate geographic extent for which specific potential ecological and human health exposure pathways are applicable to facilitate an understanding of how the proposed remediation objectives (ROs) may impact the FS. Similarly, if numeric ROs apply to a specific horizon (i.e. surface soil, subsurface soil, unsaturated soil), the conditions and assumptions should be indicated to allow for appropriate screening of site data. The assignment of specific sample data to the appropriate media for which the ROs apply will be established in the FS.
- The Technical Memorandum should specify how any ROs are deemed pertinent to the area remediated through the EPA-led Time Critical Removal Action completed in 1999.
- The Technical Memorandum should consider surface water or sediment exposure pathways relevant specifically to the area between Cork Street and Alcott Street (the discussion should not include the Kalamazoo River).
- Prior agency health assessments have concluded that PCB in river water and sediments pose no risks to recreational uses. As in the case of other OUs for the Site, recreational exposures should not be included in the CSM.
- Hunting is not permitted within city limits, so hunting exposures also do not need to be included in the CSM.

Please contact me if you have any questions or comments regarding this letter.

Respectfully Submitted,



Suda Arakere
Environmental Manager
Retained Liabilities & Remediation

cc Bonnie Barnett, Drinker Biddle & Reath LLP
Tim Scully Granzeier, ARCADIS
Mike Erickson, ARCADIS